

Kevin H. Sharp

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
AT NASHVILLE**

M.B.

Plaintiff,

v.

DR. WENDY LONG, in her official capacity
as the Deputy Commissioner of the
Tennessee Department of Finance and
Administration and Director of the Bureau of
TennCare and LARRY B. MARTIN, in his
official capacity as Commissioner of the
Tennessee Department of Finance and
Administration,

Defendants.

Civil Action No. _____

**PLAINTIFF'S MOTION FOR
LEAVE TO PROCEED UNDER
INITIALS AND MEMORANDUM
OF LAW IN SUPPORT**

Pursuant to Rule 5.2(e) of the Federal Rules of Civil Procedure, Plaintiff M.B. seeks leave from the Court to proceed in this matter using her initials rather than publicly disclosing her full name. In March 2015, M.B. fell into a coma caused by a rare gynecological condition. This action challenges the Defendants' refusal to accept a Medicaid application M.B.'s behalf from M.B.'s husband while M.B. was in a coma, as well as Defendants' subsequent refusals to grant M.B. a fair hearing regarding the effective date of her Medicaid coverage. The disclosure of M.B.'s full name would necessarily reveal private health information of the utmost intimacy.

Under Rule 5.2, the Court may protect the privacy of certain information contained in court filings. Rule 5.2(e) provides, "[f]or good cause, the court may by order in a case: (1) require redaction of additional information; or (2) limit or prohibit a nonparty's remote electronic access to a document filed with the court." The precise meaning of "good cause" has rarely been discussed by federal courts in the context of Rule 5.2(e), but the identical term is often discussed